

600 SOUTH AVENUE WEST • WESTFIELD, NEW JERSEY 07090
908.654.5000 • FAX 908.654.7866 • WWW.LDLKM.COM

PATENTS, TRADEMARKS, COPYRIGHTS & UNFAIR COMPETITION

Scott E. Charney
908.518.6336
scharney@ldlkm.com

May 17, 2005

Commissioner for Trademarks
Trademark Trial and Appeal Board
P.O. Box 1451
Alexandria, VA 22313-1451

Re: GOOSE 10.2A-001
Tiffany (NJ) Inc. v. Anthony Siragusa and Michael Romanelli
Opposition No.: 91160913, Serial No.: 76/520,262
Mark: TIFFANY'S RESTAURANT

Dear Sir:

In connection with the above-referenced Opposition proceeding, enclosed please find an original of the following:

1. Applicants' Reply Memorandum In Support of Applicants' Motion To Compel Discovery Pursuant To 37 C.F.R. § 2.120(e) and,
2. Certificate of Service.

Respectfully yours,

LERNER, DAVID, LITTENBERG,
KRUMHOLZ & MENTLIK, LLP

SCOTT E. CHARNEY

SEC/clg
Enclosures

:
:
Mark: TIFFANY'S RESTAURANTS
:
:
Serial No.: 76/520,262
:
:
Opposition No. 91160913
:
:
:
:
:
X

564962 1.DOC

interlocutory attorney Thomas W. Wellington that the instant Motion was proper. No further comments are warranted.

In an attempt at sheer gamesmanship, Opposer contends that Applicants' Motion is also deficient for failing to include copies of Applicants' interrogatories or Opposer's responses with the Motion papers. Applicants submit that copies of their interrogatories were provided in the package served on Opposer on April 1, 2005. In fact, Opposer claimed that they did not receive the actual Motion papers, but had received the exhibits. (See Exh. 1.) Applicants later provided a courtesy copy of the actual Motion papers to Opposer. (See Exh. 2.) Applicants courteously agreed to extend the time for Opposer to respond to the Motion for an additional week, in response to Opposer's contention that they had not received the Motion papers with the April 1 filing.

Opposer is now claiming that Applicants should have submitted the exhibits to Opposer for a second time, along with the courtesy copy of the Motion. This is preposterous not only because Opposer admitted that they had the exhibits, but the main document Opposer was looking for, copies of the interrogatories, was served on October 25, 2004, as admitted by Opposer. (See Opposer's Br. at 2.) Opposer responded to the interrogatories on December 29, 2004, and included a copy with its opposition papers. Obviously there has been no prejudice against Opposer stemming from Applicants' "failure" to supply the interrogatories for a third time.

Applicants also note that they did not receive a copy of Opposer's opposition, notwithstanding the certificate of service filed by Rhonda Fields. Knowing that an opposition was likely, but not having received it, Applicants reviewed the Trademark Trial and Appeal Board Website and downloaded the opposition papers on May 11, 2005. Applicants contacted

Opposer's counsel and requested the courtesy of an extension to respond. Opposer denied consent, although Opposer did state that it would not oppose any requested extension. While this is moot as Applicants have filed the immediate reply as if properly served on April 27, it exhibits the general lack of cooperation and consideration displayed by Opposer throughout this matter.¹

II. APPLICANTS' REVISED INTERROGATORIES

Although Applicants believe that the interrogatories served on October 25, 2004, contain less than 75 total requests, Applicants have revised these requests in accordance with the numbering scheme finally revealed by Opposer. By all accounts, the total number of requests does not exceed 38.

Attached hereto as Exhibit 3, is a marked-up copy of the amended requests. Applicants have handwritten the mark—ups to clearly identify which portion of the original requests have been maintained. In the right—hand border, within a square, is Applicants' counting of the amended requests. Other than with regard to a single interrogatory, as will be discussed below, Applicants have adopted Opposer's counting scheme in its entirety in counting these amended requests. Attached hereto as Exhibit 4, is a clean copy of the amended requests which Applicants submit should be answered by Opposer within ten (10) days of the Board's decision.

With respect to the one interrogatory in which Opposer's counting scheme was not utilized, Interrogatory No. 1, Opposer originally counted the request as three separate requests. Applicants have not amended the request at all, but maintain that the request contains, at most, two discreet requests. It is also believed that Opposer would agree with this assessment if

¹ To further expound upon this issue, it is noted that Applicants granted Opposer a 30-day extension of time to respond to the interrogatories. Yet, after that 30-day extension, Opposer's response was a simple statement that the interrogatories were excessive, and exceeded 75. Surely an additional 30 days was not required merely to count the interrogatories. Furthermore, when Opposer claimed that it had not received the April 1 Motion papers, Applicants immediately faxed and mailed an additional copy. Applicants also granted Opposer additional time to respond, based on its assertion that it had not received the moving papers. Reciprocal courtesies have been repeatedly refused by Opposer.

Opposer were to reconsider its counting. In fact, Applicants' counting technique for this interrogatory is entirely in line with the remainder of the interrogatories as counted by Opposer.

More specifically, the requests embodied in Interrogatory No. 1 are (1) described in detail the full extent of Opposer's business, including all goods sold and services offered, in connection with use of the mark TIFFANY, and (2) describe in detail the full extent of Opposer's business, including all goods sold and services offered, in connection with use of the mark TIFFANY & CO. Thus, it is believed that Opposer intended to place a one within the circle which is presently marked "2" and a "2" within the circle which is presently marked "3." This counting scheme is entirely in line with the remainder of the interrogatories, most clearly Interrogatory No. 2.

The remainder of the interrogatory amendments are believed to be self-explanatory, and comprise no more than 38 total requests.

III. CONCLUSION

As discussed, Applicants have adopted Opposer's counting scheme for counting the interrogatories served on October 25, 2004. The interrogatories now comprise no more than 38 total requests. Applicants request that Opposer be compelled to answer the revised interrogatories within ten (10) days of the Board's Order.

Respectfully submitted,
LERNER, DAVID, LITTENBERG,
KRUMHOLZ & MENTLIK, LLP
600 South Avenue West
Westfield, NJ 07090-1497
Tel: 908.654.5000
Fax: 908.654.7866
*Attorneys for Applicants Anthony Siragusa
and Michael Romanelli*

Dated: May 17, 2005

By: 
Scott E. Charney

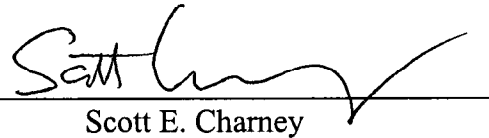
CERTIFICATE OF SERVICE

I hereby certify that a true copy of the within APPLICANTS' REPLY MEMORANDUM IN SUPPORT OF APPLICANTS' MOTION TO COMPEL DISCOVERY PURSUANT TO 37 C.F.R. § 2.120(e), was served upon the following counsel of record this 17th day of May, 2005, as follows:

VIA FIRST-CLASS MAIL:

Barbara A. Solomon, Esq.
Fross Zelnick Lehrman & Zissu, P.C.
866 United Nations Plaza
At First Avenue & 48th Street
New York, NY 10017

Attorneys for Opposer Tiffany (NJ) Inc.



Scott E. Charney

GOOSES 10.2A-001
Opposition No. 91160913

EXHIBIT 1

FROSS ZELNICK LEHRMAN & ZISSU, P.C.

RONALD J. LEHRMAN
DAVID WEILD III
STEPHEN BIGGER
ROGER L. ZISSU
MARIE V. DRISCOLL
RICHARD Z. LEHV
DAVID W. EHRLICH
SUSAN UPTON DOUGLASS
JANET L. HOFFMAN
PETER J. SILVERMAN
LAWRENCE ELI APOLZON
BARBARA A. SOLOMON
LISA PEARSON
MARK D. ENGELMANN
NADINE H. JACOBSON
ANDREW N. FREDBECK
GEORGES NAHITCHEVANSKY
CRAIG S. MENDE
PATRICK T. PERKINS
J. ALLISON STRICKLAND
JOHN P. MARGIOTTA
MARIA A. SCUNGIO

866 UNITED NATIONS PLAZA
AT FIRST AVENUE & 48TH STREET
NEW YORK, N.Y. 10017

TELEPHONE: (212) 813-5900
FACSIMILE: (212) 813-5901
E-MAIL: fzlz@frosszelnick.com

April 5, 2005

JAMES D. SILBERSTEIN
RUTH E. LAZAR
JOYCE M. FERRARO
PHILIP T. SHANNON
MICHELLE P. FOXMAN
ANGELA KIM
COUNSEL

ROBERT A. BECKER
TAMAR NIV BESSINGER
LYDIA T. GOBENA
MICHAEL CHIAPPETTA
EVAN GOURVITZ
CARLOS CUCURELLA
NANCY C. DICONZA
ZOE HILDEN
LAUREN J. MANDELL
JAMES D. WEINBERGER
JASON M. VOGEL
DAVID I. GREENBAUM
DAVID DONAHUE
CHARLOTTA MEDER
MELISSA A. ANTONECCHIA
NANCY E. SABARRA
LAURA POPP-ROSENBERG
CARA A. BOYLE
IRENE SEGAL AYERS*
JOHN M. GALLACHER

*ADMITTED IN OH. ONLY

BY MAIL

Scott E. Charney, Esq.
Lerner David Littenberg Krumholz & Mentlik LLP
600 South Avenue West
Westfield, NJ 07090

Re: *Tiffany (NJ) Inc. v. Siragusa*, Opp. No. 91/160,913
(Your Ref: GOOSES 10.2A-001; Our Ref: TFFJ 04/13531)

Dear Scott:

Today we received Applicant's Motion to Enter a Protective Order. We also received what your cover letter described as Applicant's Motion to Compel Discovery, but this did not include a motion or certificate of service, but only documents described as Exhibits A-D.

As you know, this matter was suspended by the Board on January 6, 2005. In its order, the Board stated that "[t]he parties should not file any paper which is not germane to the motion to compel," citing Trademark Rule 2.120(e)(2). (While this did not toll the time for either party to respond to discovery requests served prior to our client's motion to compel, as you know, we properly served our client's responses to your requests on December 29, 2004.) Clearly, neither of your motions presently are permitted under the Board's order, and you have cited no authority to the contrary. Moreover, while we have not yet received your Motion to Compel Discovery, from our correspondence to date we find it unlikely that your client has satisfied its obligation to make a good faith effort to "meet and confer" with our client, as required by Rule 2.120(e)(1).

We therefore suggest that, to avoid burdening the Board and the parties with impermissible and inappropriate motions, you voluntarily withdraw your motions until our client's pending motion to compel has been resolved by the Board and the matter no longer is suspended. If you insist on moving forward with your motions, however, we must insist that you properly serve us with your Motion to Compel Discovery, as required by the rules of the Board.

Scott E. Charney, Esq.
April 5, 2005
Page 2

We look forward to hearing from you.

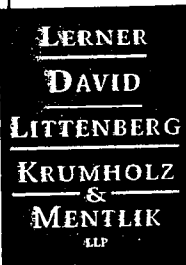
Yours sincerely,

A handwritten signature in black ink, appearing to read 'Evan Gourvitz', with a stylized, flowing script.

Evan Gourvitz

cc: Barbara A. Solomon, Esq.

EXHIBIT 2



600 SOUTH AVENUE WEST • WESTFIELD, NEW JERSEY 07090
908.654.5000 • FAX 908.654.7866 • WWW.LDLKM.COM

PATENTS, TRADEMARKS, COPYRIGHTS & UNFAIR COMPETITION

Scott E. Charney
908.518.6336
scharney@ldlkm.com

April 8, 2005

VIA FACSIMILE (212 813-5901)
CONFIRMATION BY REGULAR MAIL

Evan Gouritz, Esq.
Fross Zelnick Lehrman & Zussi, P.C.
866 United Nations Plaza
At First Avenue & 48th Street
New York, New York 10017

Re: GOOSSES 10.2A-001
Tiffany (NJ) Inc. v. Anthony Siragusa and Michael Romanelli
Opposition No.: 91160913, Serial No.: 76/520,262
Mark: TIFFANY'S RESTAURANT

Dear Evan:

This letter responds to your April 5, 2005 correspondence which we received today. In response to your statement that you did not receive Applicant's Motion to Compel Discovery, we enclose a courtesy copy. We have not included the Exhibits which you have received.

We are aware that this matter was suspended by the Board. Our motions are proper under the Board's rules. In fact, we confirmed that with the Board prior to filing.

With respect to your allegation that the parties have not "met and conferred" prior to our filing of the Motion to Compel Discovery, we must strongly disagree. We asked you repeatedly to explain the basis for your counting of our interrogatories. You categorically refused and left us no choice but to file the Motion to Compel. If you are now willing to reconsider your lack of cooperation, please advise as to which you will answer and when.

Sincerely,

LERNER, DAVID, LITTENBERG,
KRUMHOLZ & MENTLIK, LLP

SCOTT E. CHARNEY

SEC/clg
Enclosure

EXHIBIT 3

INTERROGATORIES

Interrogatory No. 1

① Separately
② Describe in detail the full extent of Opposer's business, including all goods sold and services offered, in connection with use of the marks TIFFANY and TIFFANY & CO. ③

2

Interrogatory No. 2

① Identify all documents by or on behalf of Opposer which contain any statements describing or characterizing Opposer's business utilizing the marks TIFFANY or TIFFANY'S, or any mark containing the words TIFFANY or TIFFANY'S. ③

Withdrawn

Interrogatory No. 3

① Separately
② Identify and describe all advertising and promotional activities conducted by or on behalf of Opposer with respect to Opposer's goods and service using the marks TIFFANY or TIFFANY'S, or any mark containing the words TIFFANY or TIFFANY'S, and provide all documents which refer or relate to such advertising and promotional activities. TIFFANY & CO. ③

2

Interrogatory No. 4

① Separately
② Identify and describe representative specimens of Opposer's advertisements and promotional literature using the marks TIFFANY or TIFFANY'S, or containing the words TIFFANY or TIFFANY'S. TIFFANY & CO. ③

2

Interrogatory No. 5

① Separately
② State for each calendar year since 1975, the dollar amount expended by Opposer in connection with advertising the marks TIFFANY or TIFFANY'S, or any marks containing the words TIFFANY or TIFFANY'S, and identify all documents which substantiate such advertising expenditures. or TIFFANY & CO. ④

2

Interrogatory No. 6

② Identify each product since 1975 on which Opposer has used the marks TIFFANY or TIFFANY'S, or any mark containing the words TIFFANY or TIFFANY'S, and identify a label, package, sign, brochure or advertisement which substantiates the form of each such use. ④

Withdrawn

Interrogatory No. 7

3 marks, 2 issues

② For each product sold since 1975 using the marks TIFFANY or TIFFANY'S, or any mark containing the words TIFFANY or TIFFANY'S, state the sales of each such product on an annual basis from 1975 forward, and identify all documents which support, refer or relate to such sales. ⑥

Withdrawn

Interrogatory No. 8

containing any form of the word
use of 3 marks, enforcement of rights

Identify the persons employed by Opposer who are most knowledgeable regarding the use of the marks ^④TIFFANY or ^⑤TIFFANY'S, or any mark containing the words ~~TIFFANY or TIFFANY'S~~, by Opposer; and enforcement of trademark rights by Opposer.

④ 2

Interrogatory No. 9

Describe in detail the manner in which customers may purchase goods from Opposer bearing the marks ^③TIFFANY or ^④TIFFANY'S, or any mark containing the words ~~TIFFANY or TIFFANY'S~~. TIFFANY & CO.

③ 1

Interrogatory No. 10

Describe in detail all retail store locations of Opposer which have used the marks ^①TIFFANY or ^②TIFFANY'S, or any mark containing the words ~~TIFFANY or TIFFANY'S~~, including for each such store location the annual sales of the store since 1975 and ^③representative samples of each version of signage used in relation to the store. Identify all signage at any form of

⑤ 1

Interrogatory No. 11

Describe in detail the facts and circumstances under which the Opposer first became aware of Applicants' use of the mark TIFFANY'S RESTAURANTS.

① 1

Interrogatory No. 12

2-4 kinds of proceedings, 3 marks, 2 regions

Identify and describe in detail any ^①separately opposition or cancellation proceeding, or ^②legal trademark litigation or unfair competition action, relating in any manner to the marks ^③TIFFANY or ^④TIFFANY'S, or any mark containing the words ~~TIFFANY or TIFFANY'S~~, in the ^⑤United States or any foreign country, that Opposer has been involved in. TIFFANY & CO.

⑫ 2

Interrogatory No. 13

Identify and describe in detail all filed Civil Actions involving trademarks that have involved Opposer and its ^①TIFFANY or ^②TIFFANY & CO. marks.

②

withdrawn

Interrogatory No. 14

Describe in detail all instances in which Opposer has charged, orally or in writing, formally or informally, any corporation, company, organization, association or individual with infringement of the marks ^①TIFFANY or ^②TIFFANY & CO., in the United States.

② 2

Interrogatory No. 15

Identify any third parties that Opposer has licensed, franchised, or otherwise authorized to use the marks ^③TIFFANY or ^④TIFFANY'S, or any mark containing the words ~~TIFFANY or TIFFANY'S~~.

③ 1

any form of the word

Interrogatory No. 16

Identify and describe in detail all third party uses of marks which contain ^{any form of} the words ¹ TIFFANY or ² TIFFANY'S, or ³ any similar word of which Opposer is aware. 1 3

Interrogatory No. 17

Describe in detail Opposer's procedures and policies in regard to policing its ^{any form of} ¹ TIFFANY and ² TIFFANY & CO. marks. 1 2

Interrogatory No. 18

Identify and describe in detail any instances or incidents of actual confusion or mistake or deception arising from the contemporaneous use of Opposer's ² marks ^{any form of} TIFFANY or ³ TIFFANY & CO., and Applicant's ⁴ mark ^{mark} TIFFANY'S RESTAURANTS, or ⁵ any other name of Applicant using the word TIFFANY, of which Opposer is aware. 1 4

Interrogatory No. 19

Identify and describe each poll, survey, consumer study, or other market research project commenced or completed by or on behalf of Opposer with respect to the marks ^{any form of} ¹ TIFFANY or ² TIFFANY'S & CO., or any labeling, advertising, or promotion used or to be used by Opposer. 1 2

Interrogatory No. 20

Identify all surveys conducted by or on behalf of Opposer that have included reference to the word TIFFANY in any form. 1 1

Interrogatory No. 21

Provide a copy of each trademark search commissioned by or on behalf of Opposer for any mark containing the word TIFFANY or ² any similar word in any form. 1 2

Interrogatory No. 22

Identify all studies, plans, marketing analyses, or other documents that refer or relate to any efforts by Opposer to expand use of its ^{any form of} ¹ TIFFANY mark into restaurant services, and ² identify all documents which support, refer or relate to any such efforts. 1 2

Interrogatory No. 23

Identify all persons aware of any plan or consideration by Opposer to use the marks ^{any form of} ¹ TIFFANY or ² TIFFANY'S, or ³ any marks containing the words TIFFANY or TIFFANY'S, for restaurant services. 1 3

Interrogatory No. 24

3 marks, 3 services

Identify ^{any form of} all documents that support, refer, or relate to any plan or consideration by Opposer to use the marks ^③TIFFANY or ^③TIFFANY'S, or ^③any mark using the words TIFFANY or TIFFANY'S, for restaurant services, ~~café services, and food services~~ in Opposer's retail stores. ① ⑨

Interrogatory No. 25

3 marks, 2 services

Identify all documents that support, refer, or relate to any plan or consideration by Opposer to use the marks ^③TIFFANY or ^③TIFFANY'S, or any mark using the words TIFFANY or TIFFANY'S, for food services or restaurant services within its existing retail stores. ⑥
Withdrawn

Interrogatory No. 26

^① Describe fully the origin of the term Tiffany as used in Opposer's marks and ^③identify all documents that refer or relate to the origin. ① ②

Interrogatory No. 27

^① State the basis for your contention in paragraph 22 of the Notice of Opposition that "Courts and legislatures have deemed the ^③TIFFANY mark to be a famous and distinctive mark entitled to protection from dilution," and ^③identify all documents which support, refer or relate to such contention. ① ②

Interrogatory No. 28

Identify all studies, reports, marketing research or the like referring or relating to competitors of Opposer. ①

Interrogatory No. 29

^① Identify the entities that Opposer considers to be its 10 most direct competitors and ^③all documents that support such an allegation. ① ②

Interrogatory No. 30

Identify all documents that refer or relate to the use of the name, word, or mark TIFFANY to refer to lamps. ①

Interrogatory No. 31

Identify all documents that refer or relate to any communication, contact, or correspondence between Opposer and the originator or owner of the TIFFANY mark for lamps. ①

Interrogatory No. 32

Identify all documents which refer or relate to Louis Comfort Tiffany and lamps. ①

Interrogatory No. 33

Provide a ^① ~~detailed description~~ and ^② organizational charts of Opposer's corporate structure. [1] (2)

Interrogatory No. 34

^① Identify each person whom Opposer expects to call as a witness, including experts, during its testimony and, for each such person, ^② state the substance of the facts and opinions to which such witness is expected to testify, and ^③ identify all documents in which such witness intends to rely on for its testimony, or refers or relates to expected testimony. [3] (3)

Interrogatory No. 35

For each interrogatory, identify each person ^① who was consulted to obtain information to answer such Interrogatory, ^② who contributed information from which the answer to such Interrogatory was derived, and ^③ who prepared the answer to the Interrogatory. [3] (3)

Withdrawn

EXHIBIT 4

INTERROGATORIES

Interrogatory No. 1

Separately describe in detail the full extent of Opposer's business, including all goods sold and services offered, in connection with use of the marks TIFFANY and TIFFANY & CO.

Interrogatory No. 2

Withdrawn.

Interrogatory No. 3

Separately identify and describe all advertising and promotional activities conducted by or on behalf of Opposer with respect to Opposer's goods and service using the marks TIFFANY or TIFFANY & CO.

Interrogatory No. 4

Separately identify and describe representative specimens of Opposer's advertisements and promotional literature using the marks TIFFANY or TIFFANY & CO.

Interrogatory No. 5

Separately state for each calendar year since 1975, the dollar amount expended by Opposer in connection with advertising the marks TIFFANY or TIFFANY & CO.

Interrogatory No. 6

Withdrawn.

Interrogatory No. 7

Withdrawn.

Interrogatory No. 8

Identify the persons employed by Opposer who are most knowledgeable regarding the use of marks containing any form of the word TIFFANY and enforcement of trademark rights by Opposer.

Interrogatory No. 9

Describe in detail the manner in which customers may purchase goods from Opposer bearing the marks TIFFANY or TIFFANY & CO.

Interrogatory No. 10

Identify all signage at retail store locations of Opposer which have used any form of the mark TIFFANY

Interrogatory No. 11

Describe in detail the facts and circumstances under which the Opposer first became aware of Applicants' use of the mark TIFFANY'S RESTAURANTS.

Interrogatory No. 12

Separately identify and describe in detail any legal proceeding, relating in any manner to the marks TIFFANY or TIFFANY & CO. that Opposer has been involved in.

Interrogatory No. 13

Withdrawn.

Interrogatory No. 14

Describe in detail all instances in which Opposer has charged, orally or in writing, formally or informally, any corporation, company, organization, association or individual with infringement of the marks TIFFANY or TIFFANY & CO., in the United States.

Interrogatory No. 15

Identify any third parties that Opposer has licensed, franchised, or otherwise authorized to use any form of the work TIFFANY.

Interrogatory No. 16

Identify and describe in detail all third party uses of marks which contain any form of the word TIFFANY of which Opposer is aware.

Interrogatory No. 17

Describe in detail Opposer's procedures and policies in regard to policing any form of its TIFFANY mark.

Interrogatory No. 18

Identify and describe in detail any instances or incidents of actual confusion or mistake or deception arising from the contemporaneous use of any form of Opposer's TIFFANY mark and Applicant's marks of which Opposer is aware.

Interrogatory No. 19

Identify and describe each poll, survey, consumer study, or other market research project commenced or completed by or on behalf of Opposer with respect to any form of the mark TIFFANY or any labeling, advertising, or promotion used or to be used by Opposer.

Interrogatory No. 20

Identify all surveys conducted by or on behalf of Opposer that have included reference to the word TIFFANY in any form.

Interrogatory No. 21

Provide a copy of each trademark search commissioned by or on behalf of Opposer for any mark containing the word TIFFANY in any form.

Interrogatory No. 22

Identify all studies, plans, marketing analyses, or other documents that refer or relate to any efforts by Opposer to expand use of any form of its TIFFANY mark into restaurant services.

Interrogatory No. 23

Identify all persons aware of any plan or consideration by Opposer to use any form of the mark TIFFANY for restaurant services.

Interrogatory No. 24

Identify all documents that support, refer, or relate to any plan or consideration by Opposer to use any form of the mark TIFFANY for restaurant services, in Opposer's retail stores.

Interrogatory No. 25

Withdrawn.

Interrogatory No. 26

Describe fully the origin of the term Tiffany as used in Opposer's marks.

Interrogatory No. 27

State the basis for your contention in paragraph 22 of the Notice of Opposition that "Courts and legislatures have deemed the TIFFANY mark to be a famous and distinctive mark entitled to protection from dilution."

Interrogatory No. 28

Identify all studies, reports, marketing research or the like referring or relating to competitors of Opposer.

Interrogatory No. 29

Identify the entities that Opposer considers to be its 10 most direct competitors.

Interrogatory No. 30

Identify all documents that refer or relate to the use of the name, word, or mark TIFFANY to refer to lamps.

Interrogatory No. 31

Identify all documents that refer or relate to any communication, contact, or correspondence between Opposer and the originator or owner of the TIFFANY mark for lamps.

Interrogatory No. 32

Identify all documents which refer or relate to Louis Comfort Tiffany and lamps.

Interrogatory No. 33

Provide organizational charts of Opposer's corporate structure.

Interrogatory No. 34

Identify each person whom Opposer expects to call as a witness, including experts, during its testimony and, for each such person, state the substance of the facts and opinions to which such witness is expected to testify, and identify all documents in which such witness intends to rely on for its testimony, or refers or relates to expected testimony.

Interrogatory No. 35

Withdrawn.